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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

T.K.

Plaintiff,

v.

Defendant.

Case No. 23-cv-05441

DECLARATION OF T.K.

I, T.K., being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration in support of my request to proceed under the pseudonym “T.K.”

2. I request the court permit me to bring this case as “T.K.” for several reasons.

3. While I have never met [REDACTED]

[REDACTED] in person and only spoke with him online for the span of approximately one month, the impact he has already had on my life has been equal parts enormous and devastating.

4. I allowed myself to grow close to [REDACTED] while I was going through a difficult time in my marriage. Recognizing my personal crisis, [REDACTED] went to great efforts to undermine my relationship, demonize my husband, and make himself into something he was not.

5. As a result, I engaged in uncharacteristic behavior by participating in FaceTime calls with Defendant while partially or fully unclothed.

6. Realizing my mistake, I attempted to cut off communications with Defendant, but he made it very clear he would not go quietly.

7. In response, Defendant sent multiple images he had secretly captured while we were FaceTiming. In one I was covering my bare breasts with my hands; in another my buttocks was exposed. Defendant called me awful names, told me that God does not love me, and said that he only spoke with me because he wanted to sleep with me. Defendant further threatened:

Do you think I'm playing[?]
Listen [T.K.]
What I can do
Is way worse than you can do
U know that...
What can you do
Compared to what I can do...
What
Tell me what you can do
What I can do is [worse]
Not even can do
What I'm capable of

8. As Defendant's father is Muslim, Defendant knew full well what disseminating these images would do to my family and me. Not only would I be ostracized in the community, but my parents' and brothers' reputations would be ruined as well. My actions could impact their careers, my brothers' ability to find partners – it would be poison to my family's standing in the Palestinian and Muslim communities.

9. My safety would also be jeopardized, as allegations of cheating are frequently met with physical violence by members of the slighted person's family.

10. Shortly after receiving these messages, I considered suicide to spare my family the damage that my mistakes would cause them. I told Defendant as much.

11. Between my marital situation and concerns unique to my ethnic, cultural, and religious identity, I truly felt like there was no other way out of the mess I had gotten myself into.

12. I thought Defendant must have heard the desperation in my voice because he agreed to delete the videos. I asked him to send me a screen recording of him doing so and he did. I thought my problems were over, but really they were just beginning.

13. Approximately one year later, the night before her wedding, I received a call from my cousin who informed me that “a man from New York” had sent her now-husband my intimate images. Her husband later confirmed that man was Defendant.

14. My worst nightmare had come true; I was horrified.

15. I promptly contact Defendant, told him what he had done was illegal and told him that I would be taking legal action.

16. Defendant blocked me and did not respond.

17. While I hoped my threat to take legal action had persuaded Defendant to discontinue his harassment, apparently that was not the case.

18. Instead, I later came to learn that he continued to use Omegle to speak with Palestinians and, in doing so, had connected with a young girl from Baton Rouge, Louisiana who is a family friend.

19. Apparently Defendant asked this young girl whether she knew me and when she said she did, Defendant falsely informed her that he had once come to visit me in Baton Rouge and that we had slept together. To support his claims, he showed her my images.

20. The girl was able to screenshot one image before he recognized what she was doing and threatened her to stop. The image shows my face and exposed breasts.

21. She then confronted her family with what she had seen. Her family, in turn, contacted my in-laws.

22. Believing that I had been unfaithful, members of my husband's family verbally and physically abused me. Only once I informed them that I was pregnant did they stop.

23. Since this day, I have lived in constant fear about whether Defendant has sent or shown my images or videos of me to third parties who have simply been too uncomfortable to share that information with me.

24. I cannot stop wondering if or when my life will collapse around me.

25. At night I cannot sleep and during the day I suffer from debilitating panic attacks.

26. If Defendant continues this course of conduct he will not just ruin my life but every member of my family's as well.

27. Being forced to proceed using my true name would be devastating.

28. The photos Defendant has already sent to third parties are of a highly private nature. I certainly never gave him permission or consent to record the content, much less share it and, in fact, Defendant knew that him threatening to share the content nearly drove me to suicide.

29. Beyond that, Defendant's goal is very clearly to humiliate me and ruin my life. Forcing me to use my real name in filings will only further link me to his bad acts in public records, truly devastating my name and reputation and any chance I have at a normal life in my community.

30. I have no doubt that if my name is included in these filings, he will send it to other Palestinians in Louisiana and throughout the country and perhaps even attempt to upload the intimate content onto the docket.

31. Defendant's actions have been hurtful and humiliating enough; I am not certain I would be willing to proceed with a lawsuit against him if I were forced to broadcast to the world what he has done to me using my full name.

32. My attorneys have informed me that courts permit parties to proceed using their initials in situations involving highly sensitive matters and when forcing them to use their full names would be revictimizing. That is exactly what would happen here.

33. Filing this lawsuit using my full name would be yet another invasion of my privacy and would force me to reveal more of my private moments and information to anyone who wishes to view the public record.

34. I respectfully ask for this court's assistance in allowing me to hold onto some parts of my private life without inextricably and publicly linking my name to Defendant's heinous acts.

35. Defendant is clearly preying on Muslim women using Omegle because he knows the tremendous upper hand he will have on them if they do anything to bring shame to their families.

36. While I am terrified that my decision to stand up to Defendant will contribute to my downfall, I would not be able to live myself if my silence allowed Defendant to do this to others.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 18, 2023

